

NVB 7026 (Rev. 6/16)
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**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA**

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<p>In re</p> <p>GREGG WILLIAM CHAMBERS</p> <p style="text-align: center;">Debtor(s).</p> <hr/> <p>EUGENE TUMBARELLO, and SHAMROCK PAINTING INC.</p> <p style="text-align: center;">Plaintiff(s),</p> <p>vs.</p> <p>GREGG CHAMBERS</p> <p style="text-align: center;">Defendant(s)</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>BK: 20-12895-mkn Chapter: 7 <input type="checkbox"/> Adv. No.: 20-01119-mkn</p> <p>STANDARD DISCOVERY PLAN OR REQUEST FOR WAIVER OF FILING DISCOVERY PLAN</p>
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1. Discovery Plan

 Request for waiver of requirement to prepare and file a formal discovery plan.

The parties certify that all discovery can be completed informally, without the need of court intervention and in conformance of the Standard Discovery Plan, and that the matter will be ready for trial within 120 days, or

 ✓ **A discovery plan is needed or useful in this case.** Check one:

 ✓ The parties agree to the standard discovery plan. The first defendant answered or otherwise appeared on June 17th, 2021. Discovery shall be completed within 180 days, measured from the date the first defendant answered or otherwise appeared. Discovery will close by December 14th, 2021.

____ The parties cannot agree on a discovery plan and scheduling order. The attached sets forth the parties' disagreements and reasons for each party's position. (Use Official Form 35 of the Federal Rules of Civil Procedure.)

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Complete parts 2 - 6.

2. Nature of the Case. Brief description of the nature of the case, i.e., dischargeability, denial of discharge, turnover, contract, etc. Nondischargeability of state court judgments

3. Jury Trials: Check one:

✓ A demand for a jury trial has not been made

____ A demand for a jury trial has been made pursuant to Fed. R. Civ. P. 38(b), and in conformity with LR 9015, but one or more of the parties does not consent to a jury trial pursuant to 28 U.S.C. § 157(e).

____ It is expressly understood by the undersigned parties they have demanded a jury trial pursuant to Fed. R. Civ. P. 38(b), and in conformity with LR 9015, and have consented to a jury trial pursuant to 28 U.S.C. § 157(e).

An original and two (2) copies of all instructions requested by either party shall be submitted to the clerk for filing on or before _____.

An original and two (2) copies of all suggested questions of the parties to be asked of the jury panel by the court on voir dire shall be submitted to the clerk for filing on or before _____.

4. Additional Pleadings. Are there any counterclaims, cross claims or amendments to the pleadings expected to be filed?

Yes

✓ No

5. **Settlement Conference**

_____ A settlement conference is requested.

If checked, a settlement conference is requested no earlier than _____.

☒ Settlement cannot be evaluated prior to additional discovery. The parties may later request a settlement conference.

6. **Trial**

The case should be ready for trial by January 14th, 2022 and should take 1-2 day(s).

7. All parties ☒ consent/ ☐ do not consent to this court entering final judgment.

Dated: July 14th, 2021

/s/ R. Christopher Reade

Signature of Counsel for Plaintiff(s)

Type Name, Address and
Telephone Number of Counsel

R. Christopher Reade, Esq.
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Counsel for Adversary Plaintiffs

Dated: July 14th, 2021

/s/ Christopher Burke, Esq.

Signature of Counsel for Defendant(s)

Type Name, Address and Telephone
Number of Counsel

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